

ZENAIDA TEVES
619 Paradise Valley Court
Danville, CA 94526
Telephone: (925) 735-1322
Email: dztev@sbcglobal.net

Plaintiff in *Pro Per*

AARON SILBERMAN (STATE BAR NO. 161021)
ROGERS JOSEPH O'DONNELL
Robert Dollar Building
311 California Street, 10th Floor
San Francisco, CA 94104-2695
Telephone: (415) 956-2828
Facsimile: (415) 956-6457
Email: asilberman@rjo.com

Special Assisted Mediation Counsel for PLAINTIFF

PATRICIA K. GILLETTE (STATE BAR NO. 74461)
KATINA B. MINER (STATE BAR NO. 244914)
ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Telephone: (415) 773-5700
Facsimile: (415) 773-5759
Email: pgillette@orrick.com
Email: kminer@orrick.com

Attorneys for Defendant
BANK OF AMERICA, NATIONAL ASSOCIATION
(erroneously sued as BANK OF AMERICA)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ZENAIDA TEVES

Plaintiff,

v.

BANK OF AMERICA, NATIONAL
ASSOCIATION

Defendant.

Case No. CV 10-0779 SI

**STIPULATED REQUEST TO
CHANGE TIME PURSUANT TO
CIVIL L.R. 6-2 AND [PROPOSED]
ORDER**

Judge: Hon. Susan Illston
Trial Date: June 20, 2011

STIPULATION

1
2 1. Though its undersigned counsel, Defendant Bank of America, National
3 Association and Plaintiff in *pro per*, Zenaida Teves along with her Special Assisted Mediation
4 Counsel, Aaron Silberman of Rogers Joseph O'Donnell, hereby stipulate and agree to continue
5 the deadline for engaging in Alternative Dispute Resolution pursuant to Local Rules 6-2 and 17-1.

6 2. The Parties initially stipulated and agreed to participate in court-sponsored
7 mediation.

8 3. On June 16, 2010, the Court ordered the Parties to complete the ADR
9 process within 90 days, or on or before September 14, 2010. *See* Docket No. 25.

10 4. Plaintiff filed an "Application for Assisted Mediation" and the Court has
11 appointed volunteer counsel to assist Plaintiff at mediation.

12 5. On July 30, 2010, the Court's "Order Assigning Case to Assisted
13 Mediation and Appointing Special Assisted Mediation Counsel" modified the deadline for the
14 Parties to complete the ADR process, setting the deadline for September 29, 2010. *See* Docket
15 No. 31.

16 6. Due to the recent appointment of Special Assisted Mediation Counsel and
17 the need for Plaintiff to respond to Defendant's outstanding discovery requests, both Parties
18 would benefit from additional time to conduct the mediation. Additionally, Special Assisted
19 Mediation Counsel has a scheduling conflict and is scheduled to be in trial at the end of
20 September 2010. Accordingly, the Parties request that the Court modify the current schedule and
21 adjust the deadline for participating in court-sponsored mediation to October 22, 2010.

22 7. No other time modifications by stipulation have been requested in this
23 matter.

24 8. The only effect of this request on the schedule for the case would be to
25 move the ADR deadline back by approximately three weeks. This stipulation would not change
26 the current trial schedule, as trial is scheduled for June 20, 2011.

27 9. Both parties agree to the stipulation as indicated by their electronic
28 signatures below. The parties respectfully request that the Court approve the Stipulation,

1 pursuant to Civil L.R. 6-2 and enter an Order thereupon. A form of proposed Order is filed
2 herewith.

3
4
5 DATED: August 30, 2010

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE

6
7 By: /s/ Katina B. Miner
Katina B. Miner

8 Attorneys for Defendant Bank of America, National
9 Association

10 DATED: August 30, 2010

11
12 By: /s/
Zenaida Teves

13 Plaintiff in Pro Per

14 DATED: August 30, 2010

15
16 By: /s/
Aaron Silberman

17 Special Assisted Mediation Counsel for Plaintiff

18
19
20
21 I hereby attest that the concurrence in the filing of this document has been
22 obtained from Plaintiff Zenaida Teves and Special Assisted Mediation Counsel, Aaron Silberman.

23
24 /s/ Katina B. Miner
Katina B. Miner
25 Attorneys for Defendant BANK OF AMERICA,
26 NATIONAL ASSOCIATION

ORDER

The Court having considered the above Stipulation, and good cause appearing therefore,

IT IS HEREBY ORDERED that the deadline for participating in mediation shall be continued from September 29, 2010 to October 22, 2010.

IT IS SO ORDERED.

DATED: August __, 2010



Judge Susan Illson
UNITED STATES DISTRICT JUDGE